Darcy L. Endo-Omoto
Vice President
Government & Community Affairs

February 26, 2010

The Honorable Chairman and Members of the
Hawaii Public Utilities Commission
465 South King Street, First Floor
Kekuanaoa Building
Honolulu, Hawaii 96813

Dear Commissioners:

Subject: Docket No. 2008-0273 – Feed-in Tariff ("FIT") Proceeding
Response to Commission Letter of February 19, 2010

Hawaiian Electric Company, Inc. ("HECO"), Hawaii Electric Light Company, Inc. ("HELCO"), and Maui Electric Company, Limited ("MECO") (collectively, the "Hawaiian Electric Companies") herein provide their response to the Commission's letter of February 19, 2010, in which the Commission directed the Hawaiian Electric Companies to clarify their proposal to defer distributed generation ("DG") interconnections on Maui, Hawaii Island, Molokai, and Lanai, as stated in the Hawaiian Electric Companies' February 8, 2010 Feed-In Tariff ("FIT") Reliability Standards filing. The Commission also requested that the Hawaiian Electric Companies describe "how and when will appropriate mitigation measures be identified and employed", and to further elaborate on the proposal to convene a Reliability Standards Working Group ("Working Group").

The Hawaiian Electric Companies' February 8, 2010 filing proposed to temporarily defer interconnection of additional distribution level DG resources on Maui, Hawaii Island, Molokai, and Lanai until additional studies could be conducted and mitigation measures employed to address concerns on grid reliability and excess energy curtailment. By letter dated February 9, 2010, the Hawaiian Electric Companies further clarified to the Commission that any such proposals "are fully understood to be subject to the further action and direction of the Commission."

We acknowledge that these filings have caused confusion, especially with regard to whether the Hawaiian Electric Companies are allowing interconnection of DG resources at this time. Therefore, we wish to clearly state the following key elements of our position and our operating practice with regard to DG interconnection:

1. We continue to stand by our findings that on the islands of Maui, Hawaii Island and Lanai, the high amount of intermittent renewables already in operation constrains the amount of intermittent renewable energy sources that can be added without causing noticeable impacts on grid reliability. Considering the installed megawatts of intermittent renewables on each island versus the system-wide peak power use level in 2009, Maui is at 17.3%, Lanai is at 26% and Hawaii Island is at a 29% level at this time. With the addition of two more wind farms on Maui which are currently under power purchase contract negotiation, Maui will be at nearly 40% installed intermittent energy versus peak load. The majority of intermittent renewables on these islands are wind turbines, with smaller amounts of PV. The following table below shows the Hawaiian Electric Companies' installed intermittent energy for each island.

Island	**Total Intermittent Renewables (MW)**	**Percentage of 2009 System Peak**
Oahu	9.8 MW	0.8%
Hawaii	56.4 MW	29.0%
Maui	34.6 MW	17.3%
Lanai	1.22 MW	26.0%
Molokai	0.29 MW	5.0%

No other islands in Hawaii have this high a penetration of intermittent renewables versus their peak electrical load. For example, Kauai is at less than 10% intermittent renewables versus their system peak level, the primary difference being that Kauai has no wind farms. It needs to be clearly recognized that Hawaii Island, Maui, and Lanai are far ahead of the other islands in their amounts of intermittent renewables.

Additionally, we have identified that on Maui and Hawaii Island, as more intermittent renewables are added, other renewable energy generators on these islands will be limited in the amount of energy they can produce and sell since there is a finite amount of energy being used on each island at any given instant. This excess energy issue, as well as questions of how access to the grid should be allocated to bigger projects versus small projects, or to different types of renewables requires further policy discussion.

We are calling for an intensive technical review effort by the proposed Working Group to quickly examine these concerns, and if confirmed, to identify technical and policy solutions in a very short timeframe to enable us to keep moving forward with renewable energy development. Conversely, if we do nothing to address this situation and simply keep adding resources, which is what some parties seem to be suggesting, then at some point a moratorium may indeed be necessary to prevent significant reliability or curtailment impacts. That is not our desired outcome.

2. None of the Hawaiian Electric Companies are stopping any DG interconnection requests on any of the islands, nor are we calling for any moratorium on renewable energy development. In fact, we are continuing to move aggressively towards more renewables on each of the major islands – Oahu, Maui, and the Big Island.

3. We are continuing to accept net energy metering ("NEM") applications on all islands. HELCO and MECO will continue to accept NEM applications up to the existing program levels set at 3% of each island's system peak load. Although we previously agreed to move the NEM program caps to 4% of island peak loads, in light of the issues raised on the MECO and HELCO systems we propose that the Working Group evaluate this.

4. On all islands, we will continue to process standard interconnection agreement applications – otherwise referred to as "no-sale" interconnection requests – and allow interconnections pursuant to our distributed generation interconnection tariff Rule 14.H. There are no project size restrictions on these interconnections.

5. We remain firmly committed to moving forward with implementation of the FIT program on Oahu as soon as possible, and will do so in accordance with a Commission decision and order in this docket. The PUC has set forth an Oahu FIT program size cap of 60 MW over the initial two years of the FIT offering, and we will run the program consistent with this direction. We propose that the timing of implementing FIT at MECO and HELCO should be subject to review by the proposed Working Group.

6. We would like to move as quickly as possible to establish the Working Group that will bring in technical experts from the national labs and elsewhere to help identify solutions to the technical and commercial concerns identified in the Hawaiian Electric Companies' Reliability Standards filing. Time is of the essence in convening this Working Group, which we propose should be done by the Commission within this FIT Proceeding. The Working Group must work on an accelerated basis, in order to deliver near-term recommendations in a matter of months. We agree that everything should be done to support the continued viability of the PV installer industry on Maui and Hawaii Island while the Working Group works through technical studies.

   Attachment 1 to this letter provides a proposed framework for the Working Group, including a proposed schedule for identifying mitigation measures and policy solutions. It would be the Working Group's responsibility to develop near-term, mid-term, and long-term solutions to the issues and move them to implementation as quickly as possible while the Group continues its work. Implementation of defined solutions should not wait until the end of the Working Group's term but

should be a part of an ongoing process which includes seeking Commission approval whenever appropriate. Pilot projects or other test projects may be a part of this work. As described in more detail in the attachment, we are proposing that the Working Group consist of all parties to this FIT Proceeding, a NEM project developer from Maui, and a NEM project developer from Hawaii Island. We also propose that the Public Benefits Fund Administrator be invited to participate in the Working Group, given their proposal to develop a PV incentive program. We recommend that an Independent Facilitator be retained to ensure the Working Group effort is efficient and productive, and all inputs are fairly considered. The Working Group will be supported by a Technical Support Group consisting of technical experts from the national laboratories and other energy research organizations such as the Hawaii Natural Energy Institute and the Electric Power Research Institute.

7. In April 2009, the Hawaiian Electric Companies filed a proposal to implement a new PV Host program on Oahu, Maui, and the Big Island. The PV Host program would be comprised entirely of non-utility PV installations, competitively bid to PV developers, and is intended to further stimulate the independent PV market while also allowing the Hawaiian Electric Companies to employ and evaluate advanced PV monitoring and control systems. The PV Host program application is still under review by the PUC. However, in light of the FIT Reliability Standards filing, the Hawaiian Electric Companies will propose in the PV Host proceeding that the PV Host program for Maui and the Big Island be deferred indefinitely, at least until the intermittent renewable integration issues are resolved. HECO still desires to implement the PV Host program on Oahu, and will continue with the application review process.

8. With regard to bi-lateral power purchase agreements ("PPA"), on Oahu we are continuing our aggressive push to negotiate power purchase agreements for renewables, including those that arose via the HECO renewable energy competitive bidding initiative. For HELCO and MECO, we are continuing to move forward with active bi-lateral negotiation of PPAs for the following projects:

   HELCO: PGV geothermal expansion; Hu Honua biomass; Tradewinds biomass
   MECO: Sempra Auwahi wind; Kaheawa Wind Power II

   HELCO and MECO also have numerous other proposals for intermittent renewable projects seeking PPAs via bi-lateral negotiation. Beginning in late 2009 MECO and HELCO began informing these project developers that we will continue to evaluate such proposals subject to increased scrutiny on proposal completeness and project viability, however no determinations on performance requirements, curtailment or contracting priority will be made in advance of the establishment of final reliability standards. Given that the Reliability Standards

filing is now pending before the Commission and there is much more technical and policy work to be done, MECO and HELCO will continue to maintain this position. Ultimately, the work of the Working Group will inform us of the appropriateness of continuing bi-lateral PPA negotiations at MECO and HELCO for these other projects.

In conclusion, the Hawaiian Electric Companies remain committed to aggressively moving towards a clean energy future. We will continue to interconnect renewable DG on each of the islands, and we will move aggressively to implement FIT on Oahu. No moratoriums are being called for; however, we respectfully request that the Commission convene the proposed Working Group in an expeditious manner to quickly identify solutions to continue accommodating more intermittent renewables, without causing significant negative reliability impacts or commercial impacts on existing renewables.

The Commission stated unequivocally in its September 25, 2009 Decision and Order in this proceeding that based on reliability standards or interconnection studies, the Companies "must reject projects that substantially compromise reliability" and "must not interconnect projects that will substantially compromise reliability or result in an unreasonable cost to ratepayers or would lead to significant curtailment of new or existing renewable energy generators." (Decision and Order at 56) We take to heart that it is the Hawaiian Electric Companies' responsibility – not the renewable developers – to ensure that our power system is safe and reliable, all the while as we move aggressively to a renewable energy future. We want all of our customers to embrace renewables, and that will only be possible if at the same time we maintain their expectations for reliable, cost-effective power.

Please contact Scott Seu at 543-4805 should you have any questions regarding this letter.

Sincerely,

Darcy Endo-Omoto
Hawaiian Electric Company, Inc.
Hawaii Electric Light Company, Inc.
Maui Electric Company, Limited

Attachments

c: Distribution List

ATTACHMENT 1

PROPOSED CONCEPTUAL FRAMEWORK FOR RELIABILITY STANDARDS WORKING GROUP

Hawaiian Electric Company, Inc.
Hawaii Electric Light Company, Inc.
Maui Electric Company, Limited

February 26, 2010

I. INTRODUCTION

Pursuant to the State of Hawaii Public Utilities Commission's ("Commission") September 25, 2009 Decision and Order ("Decision and Order") and October 29, 2009 Order Setting Schedule in Docket No. 2008-0273, on February 8, 2010 Hawaiian Electric Company, Inc. ("Hawaiian Electric" or "HECO"), Hawaii Electric Light Company, Inc. ("HELCO"), and Maui Electric Company, Limited ("MECO") (collectively the "Hawaiian Electric Companies" or "Companies"), jointly filed a Report on Reliability Standards ("Report") for the Hawaiian Electric Companies' Feed-In Tariff ("FIT") program ("FIT Program"). The Report raised reliability and excess energy curtailment concerns due to the high level of existing and planned intermittent renewable resource penetration on the MECO and HELCO systems.

Out of recognition that deferral or even a slowing of momentum to integrate more renewable energy projects will have far reaching impacts to renewable energy developers, achievement of the state's energy objectives, and the Hawaiian Electric Companies' compliance with Renewable Portfolio Standards ("RPS") requirements, the Companies proposed convening a Reliability Standards Working Group ("Working Group"). As described in the Report, the Working Group:

> "would serve as an open and transparent forum to allow stakeholders and technical experts an opportunity to regularly review and provide input to the studies that are described in this report and the attachments thereto. The Companies recommend that the Reliability Standards Working Group not be restricted to the FIT parties but include representatives with a range of technical expertise (e.g., the United States Department of Energy, Electric Power Research Institute ("EPRI") and the Hawaii Natural Energy Institute). This process would involve collaboration with the Working Group members to establish a framework and processes for the conduct of the studies and the identification of technical solutions. Importantly, as this process will be ongoing and require some level of flexibility to respond to changing system conditions, the Working Group process should be organized and facilitated separately from the Companies' Clean Energy Scenario Planning process. " (Report, pages 4-5)

This Framework describes the proposed Working Group's objectives, participants, structure, governance, technical studies, funding, prioritization of work, schedule, and interaction with other regulatory proceedings and processes.

II. WORKING GROUP ROLE AND OBJECTIVES

The objectives of the Working Group are to:

1. Commission an assessment by qualified technical research and development entities of the Reliability Standards findings of the Hawaiian Electric Companies filed February 8, 2010 to the Commission, to evaluate and further refine the preliminary findings.
2. To the extent that the existence of reliability and/or curtailment challenges of integrating more variable renewables – including FIT resources – on any of the islands served by the Companies are validated, commission studies by qualified technical entities to identify near-term, mid-term and long-term solutions for each island and work to implement those solutions as quickly as possible.
3. Provide a technical and policy solutions roadmap to the Commission to resolve the reliability and commercial business concerns.
4. Provide technical Reliability Standards recommendations to the Commission.

III. PARTICIPANTS AND OPERATING STRUCTURE

The Working Group will be convened under the authority of the Commission, and be run as part of Docket No. 2008-0273 through the end of June, 2011. It would be the Working Group's responsibility to develop near-term, mid-term, and long-term solutions to the issues and move them to implementation as quickly as possible while the Group continues its work. Implementation of defined solutions clearly should not wait until the end of the Working Group's term but should be a part of an ongoing process which includes seeking Commission approval whenever appropriate.

The Commission may elect to reconvene the Working Group on a periodic basis in order to assist with future FIT Reliability Standards updates. The Commission's direct oversight of the Working Group is needed to ensure that the Working Group efficiently achieves the objectives required of it by Docket No. 2008-0273, namely to inform the Commission as soon as practicable of the ability to accept more intermittent renewable energy on the islands via FIT, as well as via other energy development mechanisms. The Commission's oversight is also important to the degree that any technical or commercial information brought forth in the Working Group studies or deliberations requires confidential treatment.

The Commission has been supported in Docket No. 2008-0273 by the National Regulatory Research Institute ("NRRI"). The Commission recently announced that NRRI will be further assisted by renewable policy experts from the National Renewable Energy Laboratory ("NREL"). NRRI and its supporting NREL resources will have full access to participation in the Working Group activities.

The Working Group is proposed to be made up of the parties to the FIT docket, two net energy metering developers, and the Public Benefit Fund ("PBF") Administrator for the Commission. For reference, the parties to Docket No. 2008-0273 are as follows:

- Hawaiian Electric Companies
- State Department of Commerce and Consumer Affairs, Division of Consumer Advocacy ("CA")

- State Department of Business, Economic Development, and Tourism ("DBEDT")
- City and County of Honolulu
- County of Hawaii
- Blue Planet Foundation
- Clean Energy Maui LLC
- First Wind Hawaii
- Haiku Design and Analysis
- Hawaii Bioenergy, LLC
- Hawaii Renewable Energy Alliance
- Hawaii Solar Energy Association
- Hawaiian Commercial & Sugar Company
- Life of the Land
- Maui Land & Pineapple Company, Inc.
- Sempra Generation
- The Solar Alliance
- Sopogy, Inc.
- Tawhiri Power LLC
- Zero Emissions Leasing, LLC

Notwithstanding that the solar industry is represented broadly by a number of parties in the FIT proceeding, due to the potential impacts on the net energy metering ("NEM") PV market on Hawaii Island and on Maui, one NEM PV project developer from Hawaii Island and one from Maui should be invited to participate on the Working Group.

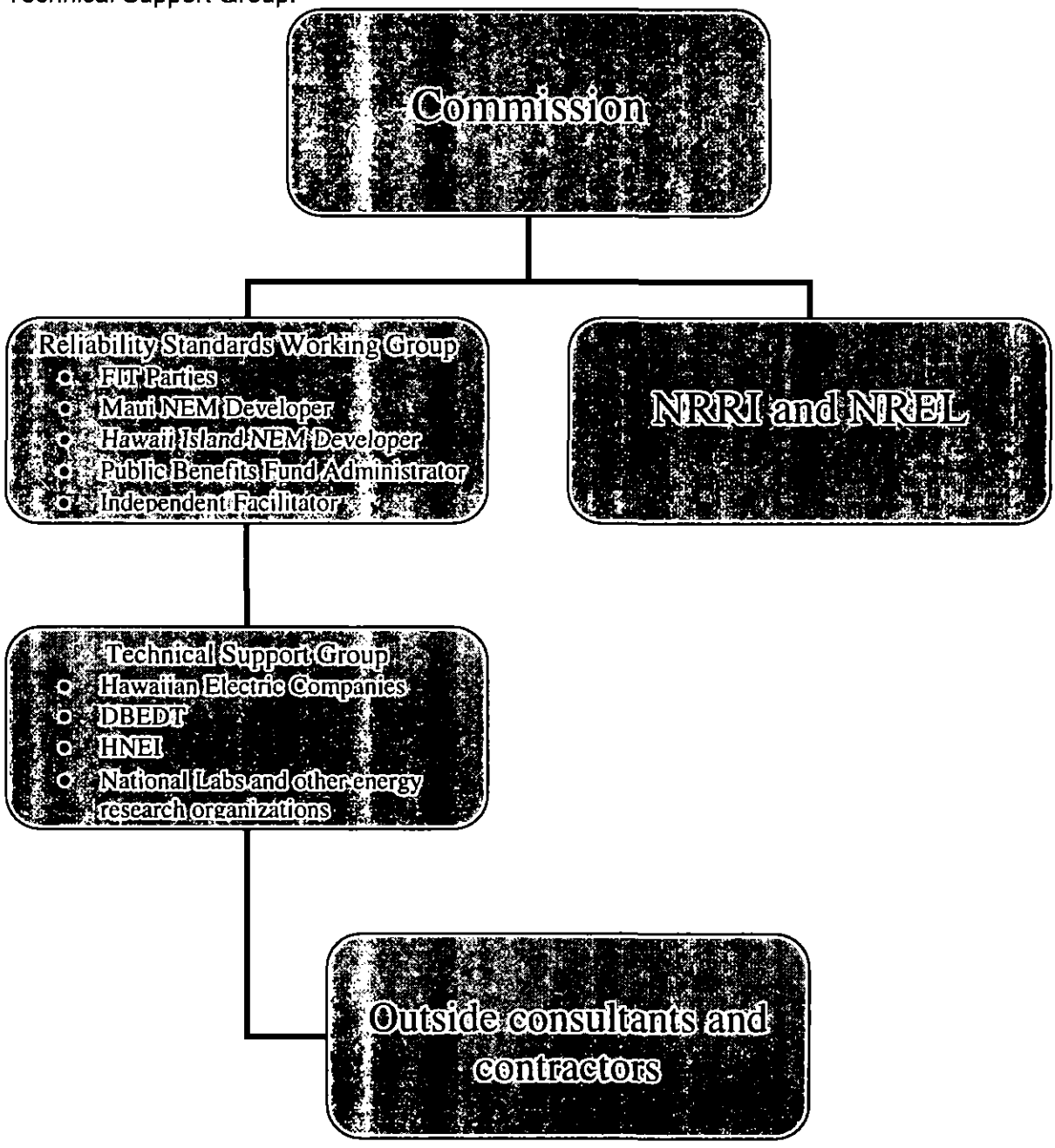
In addition, with the current PV DSM incentive program proposed by the PBF Administrator now before the Commission for approval, the current PBF Administrator, Hawaii Energy, should be invited to participate in the Working Group. Hawaii Energy's participation will also be beneficial in developing energy efficiency assumptions as a part of forward looking scenarios in the technical evaluations to the degree that such assumptions can impact the future curtailment potential for renewable energy projects.

The Hawaiian Electric Companies recommend that an independent facilitator be used to guide the Working Group process. The facilitator should be reasonably knowledgeable about the technical and commercial issues being addressed by the Working Group, and be granted suitable authority over running the procedural matters of the Working Group.

The Working Group will be supported by a Technical Support Group. The Technical Support Group will be charged with reviewing the scope of work and the output of technical studies, and providing regular feedback to the Working Group about the study objectives, methodologies, assumptions, and results. The Technical Support Group will provide recommendations based on study findings to the Working Group for consideration. The Hawaiian Electric Companies will be responsible for retaining outside consultants or contractors to perform the technical studies. The Technical Support Group will be chaired by the Hawaiian Electric Companies and consist of representatives from National Laboratories with expertise in renewable energy and renewables integration – such as in the areas of renewable generating technologies (National Renewable Energy Laboratory), power system reliability (Oak Ridge National Laboratory), distributed generation and demand response (Lawrence Berkeley

Laboratory), and solar technologies and energy storage (Sandia National Laboratory) – and other energy research organizations such as the Electric Power Research Institute ("EPRI"). DBEDT and the Hawaii Natural Energy Institute ("HNEI") of the University of Hawaii will also serve on the Technical Support Group due to their role in providing funding and facilitating energy research activities within the State of Hawaii.

The figure below illustrates the structure of the Working Group as well as the Technical Support Group.



IV. GOVERNANCE

The Working Group will be formally convened and subject to the oversight of the Commission, pursuant to the ongoing FIT Docket No. 2008-0273. Working Group procedural matters will be led by an independent facilitator who will ensure efficiency and transparency in the Working Group process. The Working Group will strive to operate by consensus, but when unable to, dissenting opinions will be noted.

The Technical Support Group will assist in scoping and overseeing the technical studies, with outside contractors performing the actual technical analysis. Technical Support Group members will review the results, provide feedback on findings, and recommend follow-on work. Technical Support Group members and contractors to the Technical Support Group will be required to execute non-disclosure agreements to protect the confidentiality of sensitive utility system operations data as well as any proprietary commercial data associated with renewable projects. Except for those who are specifically identified as being part of the Technical Support Group, Working Group members will be provided reasonable access to the methodologies, assumptions, and non-confidential data used in the technical studies, will be provided with regular progress updates, and will be afforded opportunities to provide comments, but will not directly oversee or conduct the studies. The Independent Facilitator shall oversee the interaction between the Working Group and the Technical Support Group to ensure proper information exchange is occurring.

Working Group industry members may be asked to provide project performance and other similar technical data to the Technical Support Group on a voluntary basis to support the technical studies. Such data may be treated as confidential at the request of the Working Group member and may be supplied directly to Technical Support Group contractors. Data may be requested of Working Group members in advance of the formal initiation of the Working Group by the Commission, in order to accelerate the timetable to begin the technical studies.

V. TECHNICAL STUDIES

As discussed in the Hawaiian Electric Companies Reliability Standards Report, a transparent and integrated methodology to proactively evaluate distribution level impacts on the total system performance is critical, especially when the potential for export of electricity from the distribution system back onto the transmission system can be significant. It is only through the examination of the total system that appropriate determinations can be made as to whether new resources could substantially compromise reliability and/or lead to significant curtailment of new or existing renewable energy generators.

Integrated studies are envisioned to be undertaken by the Technical Support Group and consultants through interaction with the Working Group. Broad categories for these studies include:

- Distribution Level Evaluations to baseline and assess existing high penetration circuits with varying circuit load profiles; response to frequency and voltage

issues, adequacy of protection equipment and schemes, assessment of 57Hz modification to interconnection standards and power quality.

- Integrated System Level Evaluations to assess existing variability impacts and future levels of variability; dynamic stability and dynamic response through normal conditions, faults and contingencies; normal balancing and frequency controls; generator response improvements and sensitivity due to different portfolios of generation units.
- Evaluations of operating practices and mitigation procedures.
- Identify technical solutions and provide cost estimates to facilitate an expansion of system capabilities to integrate additional levels of intermittent generation.

To facilitate studies, more system data and variable resource data are also required. The Hawaiian Electric Companies are undertaking projects to collect high resolution wind and PV data to gain better understanding of DG resource performance characteristics on the feeder circuits, typical capacity factors, generation profiles, variability and correlation between sites due to demand and weather conditions,

Finally, the cost impact and benefits of the DG need to be better understood and integrated as part of the larger overall methodology, including the contribution to system balancing and frequency control issues, displacement of other renewable energy resources and contribution to excess energy conditions.

VI. FUNDING

The Technical Support Group members will collaborate in pursuing as much outside funding as possible for the technical studies, however the Hawaiian Electric Companies will bear responsibility for retaining outside contractors to conduct the studies and will pay for any technical study expenses not covered by outside sources. The Hawaiian Electric Companies will pay for the outside service expenses of the Working Group, including the cost of the Independent Facilitator. Contracting for the Independent Facilitator will be done in accordance with Commission direction, and can be either via contract between the Hawaiian Electric Companies and the Independent Facilitator, or three way contract between the Independent Facilitator, the Commission, and the Hawaiian Electric Companies with the Companies role in the latter case being limited to payment of the Independent Facilitator invoices. Any recovery of HECO Companies' costs for Working Group activities is subject to Commission approval. Each Working Group member shall be responsible for his/her own labor costs. Consideration shall be given to provide limited inter-island travel expense reimbursement to Maui and Hawaii Island Working Group members.

VII. PRIORITIZATION OF WORK BETWEEN COMPANIES

Every effort will be made to perform work for all three companies on a parallel basis in order to maintain consistency and to avoid any one company being subject to unreasonably long delays. However, it is recognized that technical and commercial issues are particularly acute on the HELCO and MECO systems, therefore where resource priority decisions are required, HELCO and MECO shall receive priority over HECO.

VIII. SCHEDULE

February 26, 2010	Hawaiian Electric Companies file Working Group preliminary plan to Commission
March 15, 2010	FIT Parties' comments on Working Group preliminary plan
March 31, 2010	Hawaiian Electric Companies file Working Group final plan to Commission identifying proposed Technical Support Group participants, NEM Working Group participants, and preliminary scope of work for technical studies
April 2010	Commission approves Working Group final plan
April 2010	Initiate Working Group; develop written agreements with State and Federal entities as necessary; select Maui and Hawaii Island NEM developers; select outside contractors and consultants; Technical Support Group completes scoping of technical studies
May – December 2010	Conduct near-term studies; hold monthly Working Group meetings to review status of technical studies and to discuss policy and implementation issues including but not limited to immediate implementation of identified near-term solutions; Independent Facilitator provides monthly update reports to the Commission.
September 30, 2010	Working Group files first interim report to Commission providing conclusions and recommendations to date
December 31, 2010	Working Group files second interim report to Commission providing conclusions and recommendations to date
January – June 2011	Continue studies as necessary; hold monthly Working Group meetings to review status of technical studies and to discuss policy issues and implementation of identified solutions; Independent Facilitator provides monthly update reports to Commission
March 31, 2011	Working Group files third interim report to Commission providing conclusions and recommendations to date
June 30, 2011	Working Group files final report to Commission, marking conclusion of Docket No. 2008-0273 Working Group

IX. INTERACTION WITH OTHER REGULATORY PROCEEDINGS AND PROGRAMS

The Working Group is intended to focus on evaluation of FIT Reliability Standards and therefore shall operate primarily within the context of the FIT Docket No. 2008-0273. However, the work products of the Working Group may be used to inform other ongoing regulatory proceedings and programs, including the IRP Proceeding Docket No. 2009-0108, the PV Host Docket No. 2009-0098, and the Rule 14.H DG Interconnection Docket No. 2010-0015.

DISTRIBUTION LIST
(Docket No. 2008-0273)

DEAN NISHINA EXECUTIVE DIRECTOR DEPT OF COMMERCE & CONSUMER AFFAIRS DIVISION OF CONSUMER ADVOCACY P.O. Box 541 Honolulu, Hawaii 96809	2 Copies Via Hand Delivery
MARK J. BENNETT, ESQ. DEBORAH DAY EMERSON, ESQ. GREGG J. KINKLEY, ESQ. DEPARTMENT OF THE ATTORNEY GENERAL 425 Queen Street Honolulu, Hawaii 96813 Counsel for DBEDT	1 Copy Electronically Transmitted
CARRIE K.S. OKINAGA, ESQ. GORDON D. NELSON, ESQ. DEPARTMENT OF THE CORPORATION COUNSEL CITY AND COUNTY OF HONOLULU 530 South King Street, Room 110 Honolulu, Hawaii 96813	1 Copy Electronically Transmitted
LINCOLN S.T. ASHIDA, ESQ. WILLIAM V. BRILHANTE JR., ESQ. MICHAEL J. UDOVIC, ESQ. DEPARTMENT OF THE CORPORATION COUNSEL COUNTY OF HAWAII 101 Aupuni Street, Suite 325 Hilo, Hawaii 96720	1 Copy Electronically Transmitted
MR. HENRY Q CURTIS MS. KAT BRADY LIFE OF THE LAND 76 North King Street, Suite 203 Honolulu, Hawaii 96817	1 Copy Electronically Transmitted
MR. CARL FREEDMAN HAIKU DESIGN & ANALYSIS 4234 Hana Highway Haiku, Hawaii 96708	1 Copy Electronically Transmitted

DISTRIBUTION LIST
(Docket No. 2008-0273)

MR. WARREN S. BOLLMEIER II
PRESIDENT
HAWAII RENEWABLE ENERGY ALLIANCE
46-040 Konane Place, #3816
Kaneohe, Hawaii 96744

1 Copy
Electronically Transmitted

DOUGLAS A. CODIGA, ESQ.
SCHLACK ITO LOCKWOOD PIPER & ELKIND
TOPA FINANCIAL CENTER
745 Fort Street, Suite 1500
Honolulu, Hawaii 96813
Counsel for BLUE PLANET FOUNDATION

1 Copy
Electronically Transmitted

MR. MARK DUDA
PRESIDENT
HAWAII SOLAR ENERGY ASSOCIATION
P.O. Box 37070
Honolulu, Hawaii 96837

1 Copy
Electronically Transmitted

MR. RILEY SAITO
THE SOLAR ALLIANCE
73-1294 Awakea Street
Kailua-Kona, Hawaii 96740

1 Copy
Electronically Transmitted

JOEL K. MATSUNAGA
HAWAII BIOENERGY, LLC
737 Bishop Street, Suite 1860
Pacific Guardian Center, Mauka Tower
Honolulu, Hawaii 96813

1 Copy
Electronically Transmitted

KENT D. MORIHARA, ESQ.
KRIS N. NAKAGAWA, ESQ.
SANDRA L. WILHIDE, ESQ.
MORIHARA LAU & FONG LLP
841 Bishop Street, Suite 400
Honolulu, Hawaii 96813
Counsel for HAWAII BIOENERGY, LLC
Counsel for MAUI LAND & PINEAPPLE COMPANY, INC.

1 Copy
Electronically Transmitted

DISTRIBUTION LIST
(Docket No. 2008-0273)

MR. THEODORE E. ROBERTS
SEMPRA GENERATION
101 Ash Street, HQ 12
San Diego, California 92101

1 Copy
Electronically Transmitted

MR. CLIFFORD SMITH
MAUI LAND & PINEAPPLE COMPANY, INC.
P.O. Box 187
Kahului, Hawaii 96733

1 Copy
Electronically Transmitted

MR. ERIK KVAM
CHIEF EXECUTIVE OFFICER
ZERO EMISSIONS LEASING LLC
2800 Woodlawn Drive, Suite 131
Honolulu, Hawaii 96822

1 Copy
Electronically Transmitted

PAMELA JOE
SOPOGY INC.
2660 Waiwai Loop
Honolulu, Hawaii 96819

1 Copy
Electronically Transmitted

GERALD A. SUMIDA, ESQ.
TIM LUI-KWAN, ESQ.
NATHAN C. SMITH, ESQ.
CARLSMITH BALL LLP
ASB Tower, Suite 2200
1001 Bishop Street
Honolulu, Hawaii 96813
Counsel for HAWAII HOLDINGS, LLC, dba FIRST WIND HAWAII

1 Copy
Electronically Transmitted

MR. CHRIS MENTZEL
CHIEF EXECUTIVE OFFICER
CLEAN ENERGY MAUI LLC
619 Kupulau Drive
Kihei, Hawaii 96753

1 Copy
Electronically Transmitted

MR. HARLAN Y. KIMURA, ESQ.
CENTRAL PACIFIC PLAZA
220 South King Street, Suite 1660
Honolulu, Hawaii 96813
Counsel for TAWHIRI POWER LLC

1 Copy
Electronically Transmitted

DISTRIBUTION LIST
(Docket No. 2008-0273)

SANDRA-ANN Y.H. WONG, ESQ.
ATTORNEY AT LAW, A LAW CORPORATION
1050 Bishop Street, #514
Honolulu, HI 96813
Counsel for ALEXANDER & BALDWIN, INC.,
Through its division, HAWAIIAN COMMERCIAL & SUGAR COMPANY

1 Copy
Electronically Transmitted

CAROLINE BELSOM
VICE PRESIDENT/GENERAL COUNSEL
Kapalua Land Company, Ltd.,
A wholly owned subsidiary of
MAUI LAND & PINEAPPLE COMPANY, INC.
c/o 200 Village Road
Lahaina, Hawaii 96761

1 Copy
Electronically Transmitted

ISAAC H. MORIKAWA
DAVID L. HENKIN
EARTHJUSTICE
223 South King Street, Suite 400
Honolulu, Hawaii 96813-4501

1 Copy
Electronically Transmitted